

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

United States of America,

- v. -

Nicolás Maduro Moros,  
Diosdado Cabello Rondón,  
Huge Armando Carvajal Barrios,  
a/k/a/ “El Pollo,”  
Cliver Antonio Alcalá Cordones,  
Luciano Marín Arango,  
a/k/a “Ivan Marquez,” and  
Seuxis Paucis Hernández Solarte,  
a/k/a “Jesús Santrich,”

Defendants.

S2 11 CR. 205 (AKH)

PLEASE TAKE NOTICE, that upon the accompanying memorandum of law, and all of the prior proceedings in this case, Cliver Antonio Alcalá Cordones will move the United States District Court for the Southern District of New York, before the Honorable United States District Judge Alvin K. Hellerstein, for Orders:

1. Dismissing the Indictment as to General Alcalá Cordones under the doctrine of foreign official immunity;
2. Requiring the government to provide the defense with a bill of particulars, including the names of alleged unindicted co-conspirators, to permit General Alcalá Cordones to prepare his defense and avoid surprise at trial; and
3. Requiring the government to disclose information in its possession regarding General Alcalá Cordones’ involvement in anti-Maduro activities as well as the identities of

witnesses who have affirmatively denied and those who have failed to indicate General Alcalá Cordones' involvement in the alleged conspiracy; and

4. Permitting General Alcalá Cordones to make such other and further motions as may be appropriate and for such other and further relief as this Court may deem just and proper.

Respectfully submitted,

/s/  
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*Attorneys for Defendant,  
Cliver Antonio Alcalá Cordones*

DATED: New York, New York  
January 28, 2022

To: The Honorable Alvin K. Hellerstein  
United States District Judge  
U.S. District Court for the Southern District of New York  
(*Via* ECF and E-Mail)

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